

EXHIBIT A

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August 28, 2023

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Re: *White, et al. v. Samsung Electronics America, Inc.*, Civil Action No. 17-1775 (D.N.J.)

Dear Counsel:

I write to follow up on our meet and confer on August 21, 2023 and in response to your August 23, 2023 letter.

I. Discovery from Plaintiffs

It can be no coincidence that the more Plaintiffs learn about the lack of factual and legal merit to their Federal wiretapping claim, the more Plaintiffs double down on their unreasonable discovery demands and efforts to take discovery about discovery. This tactic is transparent and counterproductive and we urge you to stop.

As an initial matter, Samsung Electronics America (“SEA”) notes that Plaintiffs make much ado about SEA’s purported discovery delays while failing to comply with their own discovery obligations. Despite receiving SEA’s initial requests for production and interrogatories over three months ago, Plaintiffs have yet to fully respond to SEA’s discovery requests. *See generally* SEA’s First Set of Requests for Production Served May 22, 2023; SEA’s First Set of Interrogatories to Plaintiff White Served May 22, 2023; SEA’s First Set of Interrogatories to Plaintiff Cauley Served May 22, 2023. Though Plaintiffs are quick to point out that the original complaint was filed in 2017, Plaintiffs have not produced all documents or data concerning the Smart TVs which are the subject matter of this lawsuit. In fact, Plaintiffs have failed to produce virtually any documents other than promotional materials and have yet to produce even purchase receipts for the five other Samsung Smart TVs that Plaintiffs only recently indicated they had purchased. SEA’s Aug. 24, 2023 Letter, at 5. To be clear, Plaintiffs threaten court intervention to order Samsung to produce data associated with millions of Smart TVs when Plaintiffs have not produced accessible data from their own Smart TVs.

Further, Plaintiffs recently disclosed that Plaintiffs purchased several new Samsung Smart TVs well after the lawsuit was filed but failed to provide the DUID, PSID, and other information about these Smart TVs. *See id.* at 2. And Plaintiffs have yet to supplement Plaintiff White’s interrogatories regarding his Smart TV in Kentucky despite having months to do so. Aug. 2, 2023 Joint Letter to the Court, at 6.

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Plaintiffs' failure to fully respond to SEA's discovery requests directly implicates SEA's ability to search for and produce responsive documents. For example, DUID and PSID information from each of Plaintiffs' Samsung Smart TVs is critical to determining which terms or policies Plaintiffs may have agreed to and what information (if any) may have been collected from Plaintiffs' Smart TVs through ACR. Plaintiffs cannot shift the blame for delaying discovery to SEA when Plaintiffs have yet to produce documents and information responsive to SEA's requests and necessary for SEA to respond to Plaintiffs' requests.

II. Scope of Plaintiffs' Claim

During the August 21 meet and confer, Plaintiffs indicated—for the first time—that their sole remaining Wiretap Act claim is based on the theory that SEA intercepts communications sent from Samsung Smart TVs to Netflix or other content providers. Plaintiffs' August 23 letter goes even further, asserting that their claim encompasses "any means through which Samsung collects in real-time consumers' data and information through their SmartTV." This is not what Plaintiffs pleaded in the Second Amended Complaint. Nor is it the claim that Judge Arleo previously allowed to proceed to discovery.

Plaintiffs' Wiretap Act claim is based entirely on ACR technology. Plaintiffs' key Wiretap allegation states that "Defendants, through their . . . involvement with ACS software have intentionally intercepted" Plaintiffs' communications. Plaintiffs' Second Amend. Compl. ¶ 167. Further references to ACR are replete throughout the Complaint. *See, e.g., id.* ¶ 44 ("Defendants' [ACR] tracking software captures information about a selection of pixels on the screen and sends that data to Defendants' servers . . ."); *see also* ¶¶ 38–47 (describing ACR). Crucially, nowhere in the Complaint do Plaintiffs identify any other technology that could possibly support their Wiretap Act claim. Nor do Plaintiffs allege that SEA otherwise intercepts communications sent *from* a Smart TV to third-party applications or allege that ACR is capable of doing so.

As discovery has made clear, ACR technology generates data based on the pixels that display on a Smart TV screen; it does not involve sending, let alone "intercepting," communications sent from the Smart TV to a streaming app or other content provider. *See* Samsung's Responses to Plaintiffs' First Set of Interrogatories, at 9 (responding to Interrogatory No. 3). This is public knowledge. Alan Wolk, *Why ACR Data Is Poised to Become the Future of TV Measurement*, Forbes (Feb. 19, 2018) ("On a technological level, ACR data works because smart TVs (with permission) capture a few pixels from whatever the viewer is currently watching on the TV and share that data with the TV manufacturer's ACR tracking software.").

Judge Arleo recognized this in her opinion permitting Plaintiffs' Wiretap Act claim to proceed: "Plaintiffs have therefore alleged that there are two separate 'communications': one *from the content provider to the Smart TV*, and another from the Smart TV to Defendants' servers. And while Defendants are parties to the latter communication, it is the former that Plaintiffs allege was unlawfully intercepted." ECF No. 104, at 6 (emphasis added). Judge Arleo reiterated this understanding again in her ruling on SEA's motion for reconsideration. ECF No. 131, at 3 ("[T]he [Second Amended Complaint] more clearly indicates [than the First Amended Complaint] that there are two relevant communications at issue, namely that there is first a communication between a consumer and *a content provider who transmits content to the*

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consumer's Smart TV . . . the Court is satisfied Plaintiffs have adequately stated a Wiretap Act claim because, accepting the allegations as true, the [Second Amended Complaint] alleges that Defendants are not a party to the first communication." (emphasis added)).

The theory Plaintiffs identified at the August 21, 2023 meet and confer and in their letter is inconsistent with Plaintiffs' Complaint and the Court's orders. It further contradicts Plaintiffs' own position that any alleged communication is intercepted while it is "in transit to Defendants' Smart TVs." Plaintiffs' Opp. to Motion to Dismiss, ECF No. 97, at 27 (emphasis added). As discussed above, Plaintiffs' claims is premised solely on ACR. Any attempt to expand the scope of discovery beyond ACR or to reframe Plaintiffs' claim as alleging communications sent from Samsung Smart TVs thus would be improper and unsupported by Plaintiffs' pleadings.

III. Plaintiffs' Depositions

As noted below, SEA is willing to offer deposition dates for Messrs. Abuali and Chung. Plaintiffs' characterization of SEA as improperly "hold[ing] discovery . . . hostage" therefore is misplaced. Plaintiffs' Aug. 23, 2023 Letter, at 4. After maligning SEA for asking that Plaintiffs be made available for depositions and inspections during the same time period as Abuali and Chung, Plaintiffs engage in exactly what they complain of by conditioning Plaintiffs' depositions on SEA's production of certain documents. The Federal Rules impose no such requirement and SEA will not agree to one. Moreover, by conditioning Plaintiffs' depositions on the production of certain documents, you are refusing to make Plaintiffs available, despite your assertions to the contrary.

As discussed above, we also note that Plaintiffs' have not yet provided information that is critical to identifying data and documents that Plaintiffs have demanded before they will agree to submit to depositions. Specifically, Plaintiffs recently revealed that they both purchased new Samsung Smart TVs *after* filing this lawsuit claiming that Samsung Smart TVs intercepted their communications without their consent. Yet Plaintiffs have failed to provide the DUID, PSID, and other information for these new Smart TVs. This information is crucial to identifying any consent to terms and policies on these Smart TVs and any data collected from these Smart TVs.

SEA will not agree to any limitation on the scope or duration of Plaintiffs' depositions beyond those required by the Federal Rules. Plaintiffs' conclusory assertions that the Plaintiffs' depositions should be "very targeted" and limited to "two hours each" are contrary to the Federal Rules and prejudicial to SEA. Indeed, there are several important issues that need to be explored at Plaintiffs' depositions, including both Plaintiffs' purchase of Samsung Smart TVs *after* filing this lawsuit claiming a Wiretap Act violation. If Plaintiffs wish to impose any limitations on the scope or duration of their depositions or continue to refuse to make themselves available for depositions until SEA produces additional documents, they are required to seek a protective order, which SEA will oppose.

IV. SEA and SEC

Regarding the role of SEC, Plaintiffs continue to misunderstand that it is not SEA's job to do Plaintiffs' due diligence for them. The Federal Rules of Civil Procedure require SEA to respond to Plaintiffs' discovery requests, not produce factual evidence to support assertions

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made by counsel in a good faith effort to move discovery forward. *See generally* Fed. R. Civ. P. 26(b); Fed. R. Civ. P. 33(b); Fed. R. Civ. P. 34(b)(2). SEA has disclosed to both Plaintiffs and the Court that it is not responsible for ACR technology and that SEA’s parent company, Samsung Electronics Co., Ltd. (“SEC”), is. ECF No. 234, at 5–6. As explained in SEA’s August 14, 2023 letter, Plaintiffs have been on notice that SEC was involved in ACR and might have relevant information and documents since at least March 2018. SEA’s Aug. 14, 2023 Letter, at 1; *see* ECF NO. 61 at 7, 10. Plaintiffs chose to dismiss SEC and clearly dislike the consequences of that decision, but it cannot be laid at the feet of SEA.

Plaintiffs have not identified any specific rule or obligation that would justify court intervention. None of Plaintiffs’ requests for production ask SEA to produce “communications [that] disclosed SEC’s involvement in the data flow at the heart of Plaintiffs’ Wiretap Act claim.” Plaintiffs’ Aug. 23, 2023 Letter, at 2. Nor do they ask for “communications . . . [disclosing that SEC] possessed the bulk of the discovery in this case.” *Id.* Plaintiffs’ abstract complaint that their strategic decisions had the repercussion of making discovery more difficult for themselves does not present a ripe controversy for the Court to resolve.

Plaintiffs further cannot continue to try to litigate against SEC through SEA. As previously explained, SEA cannot and will not respond on behalf of an entity that it has no authority to speak for. *See* SEA’s Aug. 14, 2023 Letter, at 3.

V. Discovery Requests

As an initial matter, SEA notes that Plaintiffs continue to move the goal posts with each letter that they send and each meet and confer they request. Each letter contains new demands that SEA produce ever-changing categories of documents or information, many of which are not tied to a specific discovery request, on an unreasonably short timeframe, often in a matter of days. *See, e.g.*, Plaintiffs’ Aug. 8, 2023 Letter, at 2 (asking SEA to identify all responsive documents and information in its possession, custody, or control in three days); Plaintiffs’ Aug. 23, 2023 Letter, at 4 (asking SEA to provide a list of all potential custodians, non-custodial sources, and all search terms or other methods by which SEA plans to find responsive materials in two days).

SEA has agreed to search for documents in response to many of Plaintiffs’ requests. Many of those requests cover a more than eight-year period and hundreds of models of Smart TVs, and therefore require time to investigate. SEA will continue to search for and produce responsive documents pursuant to the timeline it proposed for document production—which Plaintiffs never objected to—and the Court’s scheduling orders. ECF Nos. 223 (scheduling the close of fact discovery for March 31, 2024), 233.

A. List of Smart TV Models

As discussed during our meeting, SEA is willing to provide a list of Samsung Smart TV models that it believes may potentially be encompassed in the proposed class definition. The list is attached to this letter as Appendix A.

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B. Custodial Document Searches

SEA is still considering Plaintiffs' request regarding custodial document searches. Based on SEA's preliminary investigation, it appears unlikely that Messrs. Abuali and Chung have custodial documents relating to the functionality of ACR, but they may have some custodial documents relating to the Smart TV setup process. SEA proposes meeting and conferring regarding the need for and scope of custodial searches after it has gathered additional information regarding Messrs. Abuali and Chung's custodial documents.

C. Abuali and Chung Depositions and Plaintiffs Depositions

SEA will consult with Messrs. Abuali and Chung and provide proposed dates for their depositions by August 31. But as discussed during the August 21 meet and confer, to the extent any custodial documents are produced after Abuali's and Chung's depositions, it is our understanding that Plaintiffs agree not use those documents as a basis to reopen their depositions.

D. Consent and Data Related Documents

Regarding your request for the categories stored in the consent database referenced in the Abuali and Chung declarations, we note that the portions of the database attached as exhibits to the Abuali and Chung declarations reflect certain categories of information in the database. We are attempting to determine whether these exhibits reflect the full list of categories in the database or if there are additional categories of information. We expect to provide an update to you regarding this request by September 8.

Regarding Plaintiffs' request for documents related to data collection, SEA has agreed to search for documents related to the functionality of ACR technology and documents reflecting any data collected from Plaintiffs' Smart TVs through ACR. SEA's June 8, 2023 Responses to Plaintiffs' First Set of Requests for Production, at 24–25, 28, 32 (responding to RFP Nos. 17, 20, and 24). Because SEA does not operate ACR technology, it does not appear that SEA has many, if any, documents regarding how ACR functions or regarding how and where data collected through ACR is transmitted. Regarding data collected through ACR, SEA has agreed to search for data collected from Plaintiffs' Smart TVs through ACR. *Id.* at 28, 32 (responding to RFP Nos. 20, 24). It appears that at least some data collected from Samsung Smart TVs through ACR is held in the U.S. and we are searching for it. We expect to provide an update to you regarding these issues by September 8.

E. Terms and Conditions and Privacy Policies

As explained above and in its responses and objections, SEA has agreed to search for and produce terms and conditions, privacy policies, and notices related to ACR only because the only remaining claim pled in the Complaint is premised on ACR. To be clear, SEA is willing to produce all final versions of the terms and conditions, privacy policies, and notices related to ACR that it is able to locate from a reasonable search of documents in its possession, custody, or control; it will not withhold such materials.

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SEA's search for these terms and conditions, privacy policies, and notices is ongoing. However, SEA does not maintain or possess a centralized repository of Smart TV terms and conditions, privacy policies, and notices, and therefore may not have possession, custody, or control over all sets of terms applicable to the entire proposed class.¹ We expect to be able to either produce additional relevant terms and conditions, privacy policies, and notices, or confirm that SEA does not have any such additional materials in its possession, custody, or control, by September 8.

Sincerely,

/s/ Emily Johnson Henn

Emily Johnson Henn

cc: Counsel of record

¹ Footnote 1 of your letter mischaracterizes SEA's position. As explained during the meet and confer, terms and conditions presented during the Samsung account creation process are not relevant to ACR. Because Plaintiffs' remaining claim is based *on ACR*, they are also not relevant to Plaintiffs' claim. To the extent Plaintiffs seek to broaden their claim beyond the Complaint to include any data collected through means other than ACR (which SEA opposes), SEA reserves its right to rely on additional terms and policies that may be relevant to any such data collection.

Appendix A

Smart TV Model Numbers
MNA110MS1ACXZA
QN32LS03BBFXZA
QN32LS03BDFXZA
QN32LS03CBFXZA
QN32LS03TBFXZA
QN32LS03TDFXZA
QN32Q50RAFXZA
QN32Q60AAFXZA
QN32Q60CAFXZA
QN43LS01BAFXZA
QN43LS01TAFXZA
QN43LS03AAFXZA
QN43LS03ADFXZA
QN43LS03BAFXZA
QN43LS03BDFXZA
QN43LS03RAFXZA
QN43LS03TAFXZA
QN43LS05BAFXZA
QN43LS05TAFXZA
QN43Q60AAFXZA
QN43Q60BAFXZA
QN43Q60BDFXZA
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QN43Q60RAFXZA
QN43Q60TAFXZA
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QN43Q6DAAFXZA
QN43Q6DRAFXZA
QN43Q6DTAFXZA
QN43QN90AAFXZA
QN43QN90BAFXZA
QN43QN90BDFXZA
QN43QN90CAFXZA
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QN85QN85DAFXZA
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QN85QN900CFXZA
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